

REMARKS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are unpatentable under the provisions of 35 U.S.C. §§ 101, 102 and 103. The Applicants have amended claims 1 and 12. Support for the amendments may be found in Applicants' specification on at least paragraph [0061]. Thus, the Applicants believe that all of these claims are now in condition for allowance.

In response to the Notice of Non-Compliant Amendment issued on July 15, 2009, the Applicants respectfully submit that the RCE filed on March 31, 2009 does, in fact, comply with the provisions of 37 CFR 1.121. 37 CFR 1.121 sets forth the form in which amendments to an application must be made. The RCE filed on March 31, 2009 adheres to all of these format requirements.

The Examiner appears to suggest that the RCE is non-compliant because the Applicants did not amend certain claims in response to the Examiner's previous rejections under 35 U.S.C. § 101. However, the Applicants note that the RCE presented several arguments in support of these claims in their un-amended forms. Thus, the Applicants believe that the 35 U.S.C. § 101 rejections were fully addressed. If the Examiner is not persuaded by these arguments, then the Applicants respectfully submit that the proper response is to point out the errors in the Applicants' arguments. The Applicants are aware of no rule that holds an amendment unresponsive or non-compliant simply because it disagrees with the Examiner's rejection.

Thus, the Applicants respectfully submit that the RCE filed on March 31, 2009 fully complies with the requirements of 37 CFR 1.121 and that the Notice of Non-Complaint Amendment issued on July 15, 2009 is improper. Nevertheless, the Applicants have amended claims 1 and 12 in order to more clearly recite aspects of the present invention.

I. REJECTION OF CLAIMS 1-9, 11-20 AND 22 UNDER 35 U.S.C. § 101

A. Claims 1-9 and 11, useful and tangible result

The Examiner rejected claims 1-9 and 11 under 35 U.S.C. §101 as being directed to subject matter that fails to produce useful, tangible and concrete result. The Applicants respectfully traverse the rejection.

The Examiner's attention is directed to the fact that the claimed invention is directed to a **system** e.g., that comprises an integrated business applications system for integrating a plurality of business applications across products and services to produce integrated business applications in response to authorized user selections of at least one business application from said unified portal. The Applicants submit that a system for providing a response to a user request is a tangible, concrete and useful system. For example, the system receives a user selection to integrate various products, services, and so on. For example, the user selection may be to generate a trouble ticket for a particular product. The business application function may then integrate information associated with generating a trouble ticket. (See e.g., Applicants' Spec., Paragraph [0082]). Therefore, Applicants' claims 1-9 and 11 properly recite a **system** that produces useful, concrete and tangible result. As such, the Applicants respectfully request that the rejection be withdrawn.

B. Claims 1-9, 11-20 and 22, non-statutory subject matter

The Examiner rejected claims 1-9, 11-20 and 22 under 35 U.S.C. §101 as being directed to non-statutory subject matter. The Applicants respectfully traverse the rejection.

The Examiner alleges that claims 1-9, 11-20 and 22 are claiming a system or a method that comprises software only. Applicants respectfully disagree.

First claims 1-9 and 11 recite a system. Clearly a system is not software per se. The Examiner's attention is directed to Applicants' Specification, paragraphs [0035]-[0040] and [0090]-[0091]. The **system** may be implemented using computing devices that comprise a server, a processor, a memory for storing programs, data, etc, support circuits, I/O devices, etc. For example, the Applicants submit that paragraphs [0035]-[0040] cite one or more servers for specific functions that clearly comprise hardware. Furthermore, paragraphs

[0090] and [0091] recite computing devices. To further clarify that Applicants' invention is not software per se, Applicants have amended independent claim 12 to recite "at least one server." As such, Applicants' claims 1-9, 11-20 and 22 properly recite a system or a method that is fully supported by Applicants' specification and are directed to a statutory subject matter. As such, the Applicants respectfully request that the rejection be withdrawn.

II. REJECTION OF CLAIMS 1-9 AND 12-20 UNDER 35 U.S.C. § 102

The Examiner rejected claims 1-9 and 12-20 under 35 U.S.C. §102 as being anticipated by, Campbell et al., U.S. Patent No. 6,871,193 B1, issued on March 22, 2005, hereinafter referred to as "Campbell." The Applicants respectfully traverse the rejection.

Campbell teaches a gateway for providing consumer services that includes a partition associated with a gateway and operable to control access to at least one utility service and a bundle associated with the partition. (See Campbell, Abstract).

The Examiner's attention is directed to the fact that Campbell fails to teach or suggest a system or a method for a unified shared business application comprising an enterprise function module, for providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein the enterprise function module associates a CCI associated with each enterprise to each user accessing the unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer, as positively claimed by the Applicants. Specifically, the Applicants' independent claims 1 and 12 recite:

1. A unified shared business application system, comprising:
 - a unified portal for authenticating and authorizing user preferences and restrictions;
 - an enterprise function module, for providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein said enterprise function module associates a CCI associated with each enterprise to each user accessing

said unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer;

an integrated business applications system for integrating a plurality of business applications across products and services to produce integrated business applications in response to authorized user selections of at least one business application from said unified portal; and

a database warehouse for storing information associated with said business channels of said plurality of enterprises, each user, and said products and services. (Emphasis added).

12. A method of unifying and sharing business applications with respect to a user of a business channel, comprising:

authenticating and authorizing, at a unified portal of at least one server, user preferences and restrictions in response to a user request for access;

providing, at an enterprise function module of said at least one server, a common customer identifier (CCI) for users associated with a plurality of business channels of an enterprise, wherein said enterprise function module associates a CCI to each user accessing said unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer;

integrating, at an integrated applications system of said at least one server, in response to a user selection of a business application, information associated across a plurality of business applications with respect to products and services to produce integrated business applications in response to authorized user selections of at least one business application from said unified portal; and

storing, at a database warehouse of said at least one server, information associated with said business channels, each user, and said products and services. (Emphasis added).

In one embodiment, Applicants' invention discloses a system or a method, for a unified shared business application comprising an enterprise function module, for providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein the enterprise function module associates a CCI associated with each enterprise to each user accessing the unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer. (See e.g., Applicants' Specification, paragraphs [0055] and [0058]). The Applicants' invention teaches that the user is associated with a CCI number and the CCI is used to identify a user with a particular enterprise. Additionally, from the perspective of the carrier, the CCI

provides indicia of priority for servicing for an enterprise customer. In one example, the CCI is used to provide priority to customers that have higher priority ratings.

In contrast, Campbell teaches providing consumer services that include a partition associated with a gateway and operable to control access to at least one utility service and a bundle associated with the partition. The Examiner's attention is directed to Campbell, Column 13, Lines 56-66. In fact, Campbell teaches away from Applicants' invention. Campbell only teaches user preferences being used to provide customized presentation to customers. The portal page is able to present information that a particular user indicated as information of interest to the user. In contrast, Applicants' invention teaches using the CCI directly to provide indicia of priority for servicing. Applicants' invention advantageously enables the service provider to provide the appropriate level of service by simply using the CCI without the need for further requirement on the user.

In the Final Office Action dated December 31, 2008, the Examiner argues that Campbell teaches a CCI that provides an indicium of priority for servicing an enterprise customer. However, the cited paragraph is only concerned with whether a customer has authorization to access a service and thus whether access should be granted or denied. As such, the section cited by the Examiner in the Final Office Action in Campbell only discloses a typical authorization process, i.e., a user can access the service if the user is authorized. In contrast, the Applicants' invention teaches providing priority to customers that have higher priority ratings by simply using the CCI. For example, the CCI is used to determine the priority, such that customers who have higher priority ratings will be treated preferentially than those customers with lower priority ratings. Thus, Applicants submit that claims 1 and 12 are not anticipated by Campbell.

In addition, dependent claims 2-9 and 13-20 depend from independent claims 1 and 12, respectively, and recite additional limitations. As such, and for the exact same reason set forth above, the Applicants submit that claims 2-9 and

13-20 are also patentable over Campbell. As such, the Applicants respectfully request that the rejection be withdrawn.

III. REJECTION OF CLAIMS 11 AND 22 UNDER 35 U.S.C. § 103

The Examiner rejected claims 11 and 22 under 35 U.S.C. §103 as being unpatentable over Campbell in view of Nichols et al., U.S. Patent Publication No. 2003/0055652 A1, published on March 20, 2003, hereinafter referred to as "Nichols." The Applicants respectfully traverse the rejection.

The teachings of Campbell are discussed above. Nichols teaches a private network exchange with multiple service providers, having a portal, collaborative applications and a directory service. (See Nichols, Abstract).

The Examiner's attention is directed to the fact that Campbell and Nichols, alone or in any permissible combination, fail to disclose the novel system or method for a unified shared business application comprising an enterprise function module, for providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein the enterprise function module associates a CCI associated with each enterprise to each user accessing the unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer, as positively claimed by the Applicants' independent claims 1 and 12. (See *Supra*).

As discussed above, the alleged combination (as taught by Campbell) simply does not teach or suggest a system or a method for a unified shared business application comprising an enterprise function module, for providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein the enterprise function module associates a CCI associated with each enterprise to each user accessing the unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer.

Moreover, Nichols does not bridge the substantial gap left by Campbell because Nichols also fails to teach or suggest a system or a method for a unified shared business application comprising an enterprise function module, for

providing a common customer identifier (CCI) for users associated with a plurality of business channels of a plurality of enterprises, wherein the enterprise function module associates a CCI associated with each enterprise to each user accessing the unified portal, wherein said CCI provides an indicium of priority for servicing an enterprise customer. Nichols only teaches a private network exchange that operates across multiple service providers, having a portal for providing a user friendly interface to present collaborative applications and a directory service that presents to the user a way to search the network. (See Nichols, Abstract). Thus, for all the above reasons, the Applicants respectfully contend that claims 1 and 12 are not made obvious by the combination of Campbell and Nichols.

Moreover, dependent claims 11 and 22 depend from independent claims 1 and 12, respectively, and recite additional limitations. As such, and for the exact same reason set forth above with regard to independent claims 1 and 12 being patentable over Campbell and Nichols, the Applicants submit that claims 11 and 12 are also patentable over Campbell and Nichols. As such, the Applicants respectfully request that the rejection be withdrawn.

CONCLUSION

Thus, the Applicants submit that all of these claims now fully satisfy the requirements of 35 U.S.C. §§ 101, 102 and 103. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the maintenance of a final rejection in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong, Esq. at (732) 842-8110, Ext. 130 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully Submitted,

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